REMARKS

In the Office Action mailed on February 7, 2007, the Examiner took the following action: (1) rejected claims 1-25 under 35 USC §112, first paragraph, as failing to comply with the written description requirement; (2) rejected claims 1-17 under 35 USC §103(a) as being unpatentable over Frerebeau (U.S. App. Pub. No. US 2003/0135501), by Kerr (U.S. App. Pub. No. US 2004/0088155), and further in view of Allard (U.S. Patent no. 6,370,561); and (3) rejected claims 18 – 25 as being unpatentable over Frerebeau (U.S. App. Pub. No. US 2003/0135501), and further in view of Allard (U.S. Patent no. 6,370,561). Applicants respectfully request entry of the amended claims and reconsideration of the pending claims in view of the foregoing amendments and the following remarks.

REJECTIONS UNDER 35 USC §112, FIRST PARAGRAPH

Claims 1-25 stand rejected under 35 USC §112, first paragraph, for failing to comply with the written description requirement. 35 USC § 112, first paragraph, states:

> The specification shall contain a written description of the invention, and of the manner and process of making and using it, in such full, clear, concise, and exact terms as to enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the same, and shall set forth the best mode contemplated by the inventor of carrying out his invention.

The Examiner rejected claims 1-25 under 35 USC § 112, first paragraph, "as failing to comply with the written description requirement," that "the satellite assembly being configured to provide content to enable execution of a script embedded in a requested page" was not "described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s),

at the time the application was filed, had possession of the claimed invention." (Office Action p. 2, ¶ 3). Applicants have amended independent claims 1-25 to recite "the satellite assembly providing the localized content to replace content on the requested page prior to a server executing a script containing the localized content embedded in the requested page" (Claim 1), "the satellite assembly providing the localized content to replace content on the requested page prior to a server ~~to execute~~ executing a script containing the localized content embedded in the requested page" (Claim 10), and "the referenced satellite assembly being configured to replace the localized web content with non-localized web content on the requested page prior to the computer executing a script" (Claim 18). Applicant respectfully submits that the amended claims comply with 35 U.S.C. 112 first paragraph.

As stated by the examiner in the response to the office action, applicants submit that their specification discloses server execution of scripts embedded in web pages (Page 4; lines 11-13). Further the specification states that the satellite assembly includes a DLL which contains localized content (page 7, lines 9-12; page 8, lines 2 - 5), and states that the server executes a script embedded on a web page, included in the requested web page with localized content (Page 7; lines 11-13, 20-21; page 9, 17-19) Applicants submit these amended claims comply with the written description requirement, and respectfully request reconsideration and withdrawal of the 112 second first paragraph rejection of claims 1-25.

REJECTIONS UNDER 35 USC §103(A)

Claims 1-17 have been rejected under 35 USC §103(a) as unpatentable over Frerebeau (U.S. App. Pub. No. US 2003/0135501), by Kerr (U.S. App. Pub. No.

US 2004/0088155), and further in view of Allard (U.S. Patent no. 6,370,561). Applicants respectfully traverse these rejections.

Frerebeau (U.S. App. Pub. No. US 2003/0135501)

As previously stated by Applicants in the prior response, Frerebeau describes localizing the content of a reference document 8 using a localization tool 11. The content is localized in the factory (p108), delivered to third parties so they can do it themselves (P109), or upon installation of the localization software (or "on the fly", e.g. when the JavaScript code is loaded and embedded on the web page) (para. 0110).

As best shown in Figure 1 of Frerebeau, the localization tool 11 receives the reference document 8 and a translation file 10 and formulates a localized file 13. According to Frerebeau, the translation file 10 constitutes the content model which specifies the positions of titles and paragraphs, indicates which information is to be provided, and which information is to be localized. (Para. 0085). Thus, Frerebeau teaches that the localization tool 11 produces the localized file 13 (*e.g.* a web page) from the reference file 8 and the translation file 10 by replacing the localization tags of the reference file 8 with the localized values of the identifiers given by the appropriate translation file 10. (Para. 0086).

Frerebeau does not disclose, teach, or fairly suggest the methods and systems taught by Applicants. Specifically, Frerebeau fails to teach or fairly suggest *identifying a culture associated with the page request by analyzing the page request, ... determining whether one of a plurality of satellite assemblies is associated with the identified culture; ... and referencing the satellite assembly associated with the identified culture to locate content in the satellite assembly*

associated with each of the one or more values associated with the localization attribute, the satellite assembly being configured to provide the content prior to execution by a server of a script embedded in the requested page as recited in claim 1 for example. As described in Applicants' detailed description, methods and systems of the invention may determine which of many satellite assemblies is to be used by analyzing web page requests. Applicant also provides substitutable text prior to execution by a server of a script embedded in a requested page. This capability may be important, for example, for enabling server execution of scripts embedded in web pages prior to sending the web page to the client. (Specification, p. 4, lines 11-13). There is no teaching or suggestion in Frerebeau of at least these aspects of Applicants' invention.

Kerr (U.S. App. Pub. No. US 2004/0088155)

Kerr likewise does not include the features of the claimed invention, nor would it be obvious to combine Kerr with Frerebeau. For example neither Kerr nor Frerebeau determine which of many satellite assemblies is to be used by analyzing web page requests, and then provide content from the assemblies replaces content on the requested web page that is subsequently placed in a script and executed by the server. Applicant hereby requests withdraw of the Kerr reference from the 103(a) rejection.

Allard (U.S. Patent no. 6,362,840)

Allard describes method by a client sends a request to a server and in response to the request the server parses the request to determine whether to load a DLL that is executed (Column 5; lines 15 – 57). Likewise Allard does not disclose

which one of many satellite assemblies is to be used as substitute localize content on a web page by analyzing web page requests. Further Allard does not teach providing the content from the identified satellite assemblies to replace content on the requested web page that is subsequently placed in a script and executed by the server.

Claims 1-9

Turning now to the specific language of the claims, amended Claim 1 recites

> A method of providing localization of a web service, comprising:
> *receiving a page request from a requester of the web service;*
> *identifying a culture associated with the page request by analyzing the page request;*
> identifying a localization attribute and one or more values associated with the localization attribute in a requested page associated with the page request;
> *determining whether one of a plurality of satellite assemblies is associated with the identified culture;*
> *referencing the satellite assembly associated with the identified culture to locate content in the satellite assembly associated with each of the one or more values associated with the localization attribute,* the satellite assembly being configured to provide the content prior to execution by a server of a script embedded in the requested page;
> replacing the identified one or more values associated with the localization attribute in the requested page with the content associated with the each of the one or more values located in the referenced satellite assembly to provide a culture-dependent response; and
> transmitting the culture-dependent response to the requester of the web service. (emphasis added).

As described more fully above, neither Frerebeau, Kerr nor Berg disclose, teach, or fairly suggest the method recited in claim 1. Specifically, Frerebeau fails to teach or fairly suggest a method that includes "receiving a page request from a requester of the web service;", "identifying a culture associated with the page

request by *analyzing the page request;*" "*determining whether one of a plurality of satellite assemblies is associated with the identified culture;*" and "*referencing the satellite assembly associated with the identified culture to locate content in the satellite assembly* associated with each of the one or more values associated with the localization attribute, the satellite assembly being configured to provide the content prior to execution by a server of a script embedded in the requested page" as recited in claim 1.

The Office cites Frerebeau for referencing a satellite assembly associated with the identified culture to locate an identifier associated with each value associated with the localization attribute, however, there is no indication in Frerebeau of determining which one of many satellite assembly is associated with an identified culture (that was identified by analyzing page request) that is provided prior to execution by a server of a script embedded in a requested page as recited in claim 1. The office cites Allard for sends a request to a server and in response to the request the server parses the request to determine whether to load a DLL that is executed; however, there is not indication in Allard of the satellite assembly being configure to be injected into a script that is then executed by a server. Allard loads an entire DLL which is different from injecting content into a script for execution.

Accordingly, claim 1 is allowable over Frerebeau, Kerr and Allard for at least this reason. Claims 2-9 depend from claim 1 and are allowable at least due to their dependency on claim 1, and also due to additional limitations recited in those claims.

Independently Claim 7 recites wherein determining whether one of a plurality of satellite assemblies is associated with the identified culture includes determining whether a satellite assembly associated with the identified culture is unavailable, and wherein the method further comprises referencing the satellite assembly associated with a default culture in the event that the satellite assembly associated with the identified culture is unavailable. None of the references disclose referencing a default culture in the event a satellite assembly associate with the identified culture is unavailable. Accordingly, claim 7 is allowable over Frerebeau, Kerr and Berg for at least this reason.

Claims 10-17

Similarly, claim 10 recites:

> A computing-based system for providing localization of a web service, comprising:
> a server receiving a page request via a network from an agent;
> a culture identification module configured to identify a culture associated with the received page request by analyzing the page request;
> a localization values parsing module configured to identify a localization attribute and values in the-a requested page associated with the page request;
> a key values parser configured to locate localized content associated with the localization attributes and localization values and to designate the localized content to replace content referenced by the localization attributes and localization values in the requested page;
> *a satellite assembly, selected using the culture identified by analyzing the page request, that includes the localized content located by the key values parser, the satellite assembly providing the localized content to replace content on the requested page prior to a server executing a script containing the localized content embedded in the requested page;* and
> wherein the localized content is associated with the identified culture and is utilized when the requested page is served to the agent making the page request (emphasis added).

As described more fully above, Frerebeau, Kerr and Allard do not disclose, teach, or fairly suggest the system recited in claim 10. Specifically, Frerebeau, Kerr and Allard fail to teach or fairly suggest a computing-based system that includes "a satellite assembly, *selected using the culture identified by analyzing the page request*, that includes the localized content located by the key values parser, the <u>satellite assembly providing the localized content to replace content on the requested page prior to a server executing a script containing the localized content embedded in the requested page;</u>" as recited in claim 10. Therefore, claim 10 is not anticipated by Frerebeau. Claims 11-17 depend from claim 10 and are allowable at least due to their dependency on claim 10, and also due to additional limitations recited in those claims.

Claims 18-25

Claim 18 recites:

> One or more computer-readable media containing computer-executable instructions that, when executed on a computer, perform the following steps:
> receiving via a network a page request from a client for web content for a preferred culture;
> identifying the preferred culture from the page request;
> determining if localized web content corresponding to the preferred culture is available;
> localizing the web content for the preferred culture if localized web content is available for the preferred culture;
> localizing the web content for a default culture if localized web content is not available for the preferred culture, wherein at least one of localizing the web content for the preferred culture and localizing the web content for a default culture includes *referencing one of a plurality of satellite assemblies, selected using the identified preferred culture from the page request, to provide a localized content associated with at least one of the preferred culture and the default culture, the referenced satellite assembly being configured to replace the localized web content with non-*

localized web content on the requested page prior to the computer executing a script, said script being embedded in the requested page with the provided localized web content so that when the script is executed with the provided localized web content attributes of the requested page are known before being transmitted to the client; and

delivering the requested page *with the executed script* to the client via a network. (emphasis added).

Again, as described more fully above, Frerebeau, and Allard do not disclose, teach, or fairly suggest the computer-readable media recited in claim 18. Specifically, Frerebeau fails to teach or fairly suggest a computer-readable media that includes "referencing one of a plurality of satellite assemblies, *selected using the identified preferred culture from the page request,* to provide a localized content associated with at least one of the preferred culture and the default culture, the referenced satellite assembly being *configured to replace the localized web content with non-localized web content on the requested page prior to the computer executing a script,* said script being embedded in the requested page with the provided localized web content *so that when the script is executed with provided localized web content attributes of the requested page are known before being transmitted to the client;* and delivering the requested page with the executed script to the client via a network." as recited in claim 18. Therefore, claim 18 is not unpatentable over Frerebeau in view of Allard. Further Allard discusses loading an entire DLL, and does not teach executing with a server a script on a requested web page combined with localized content, and then delivering the script executed localized content to the client. Claims 19-25 depend from claim 18 and are allowable at least due to their dependency on claim 18, and also due to additional limitations recited in those claims.
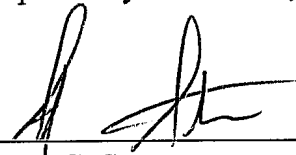
CONCLUSION

For the foregoing reasons, Applicants respectfully request entry of this amendment, reconsideration and withdrawal of the rejections of claims 1-25 and allowance of same. If any issue remains unresolved that would prevent allowance of this case, the Examiner is kindly invited to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

Dated: _8/6/07_

By: _____

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